

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

JANE DOE,]	
Plaintiff,]	Case No. 3:25-cv-131
]	
v.]	
]	
BELMONT UNIVERSITY,]	
Defendant.]	
]	

MOTION TO SEAL

Comes now Defendant Belmont University (“Belmont”), by and through undersigned counsel, and moves the Court to file under seal the Plaintiff’s deposition transcript, taken on June 11, 2025, Marina Powell’s deposition transcript, take June 13, 2025, Tamika Williams’ personal deposition, taken on June 10, 2025, and Tamika Wlliams’ deposition testifying as Belmont’s corporate witness pursuant to Rule 30(b)(6) of the Fed. R. Civ. P., taken June 13, 2025, as attachments to Defendant’s Memorandum of Law in Support of Defendant’s Response in Opposition to Plaintiff’s Motion for Preliminary Injunction. Plaintiff Jane Doe has marked her deposition as Confidential pursuant to the parties’ Agreed Protective Order entered by this Court on June 26, 2025 (Doc. 50). The remaining documents contain potentially personally identifying information of Plaintiff, and should be sealed because Plaintiff is proceeding under a pseudonym.

Respectfully submitted,

/s/ Jennifer Smith Rusie

Jennifer Smith Rusie, BPR No.

Lauren Irwin, BPR No. 038433

JACKSON LEWIS P.C.

611 Commerce Street, Suite 2803

Nashville, TN 37203

Telephone: (615) 565-1661

Email: Jennifer.rusie@jacksonlewis.com

Lauren.Irwin@jacksonlewis.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I certify that, on July 16, 2025, I served a true and correct copy this *Motion to Seal Document* via electronic mail, upon the following counsel of record:

TIFFANY D. HAGAR, #029190

ERIC L. PHILLIPS, #027980

DAVID C. BRUST #040233

Hagar & Phillips, PLLC

Attorneys for Petitioner

207 University Avenue

Lebanon, TN 37087

(615) 784-4588

(855) 286-8279

dbrust@hplawtn.com

/s/ Jennifer Smith Rusie

Jennifer Smith Rusie